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## UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

multidistrict  
Multidistrict DIVISION

Star 810#  
Jaime Carrasco Castaneda  
(Enter full name of plaintiff)

Plaintiff,

v.

Civil Case No. 6:22-cv-01430-CL  
(to be assigned by Clerk's Office)

COMPLAINT FOR VIOLATION OF CIVIL  
RIGHTS (PRISONER COMPLAINT)

Ad Larson (commander) deputy  
Marion County Corrections Deputy  
Ramsey Johnson Decker  
Decker Decker Decker  
(Enter full name of ALL defendant(s)) Boyle Decker

Defendant(s).

## I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

## Plaintiff

Name: Jaime Carrasco Castaneda  
Street Address: 4000 Avenue Ave SE  
City, State & Zip Code: Salem OR 97307  
Telephone No.: (For home being MCT Law Library)

Defendant No. 1

Name: Deputy [REDACTED] Ramsey  
 Street Address: 4000 Ainsville Hwy SE  
 City, State & Zip Code: Salem, OR 97317  
 Telephone No.: 503-588-8588

Defendant No. 2

Name: SGT [REDACTED] /underboss to Tad Larson  
 Street Address: 4000 Ainsville Hwy SE  
 City, State & Zip Code: Salem, OR 97317  
 Telephone No.: 503-588-8588

Defendant No. 3

Name: Tad Larson  
 Street Address: 4000 Ainsville Hwy SE  
 City, State & Zip Code: Salem, OR 97317  
 Telephone No.: 503-588-8588

Defendant No. 4

Name: [REDACTED] & Sgt Reichhagen  
 Street Address: 4000 Ainsville Hwy SE  
 City, State & Zip Code: Salem, OR 97317  
 Telephone No.: 503-588-8588

## II. BASIS FOR JURISDICTION

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. You are bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

/Marion Co Jail employees/  
 Sheriffs, commanders etc

B. What federal constitutional, statutory, or treaty right(s) is/are at issue?

Eight Amendment Fourth Amendment Fourteenth Amendment  
& possibly others

### III. STATEMENT OF CLAIMS

#### Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

Ted Larson MCF Commander 6-29-22 9:00am  
Beidberger was ATTEMPT to  
5/2/22 MCF Deputy [REDACTED] by STAFF [REDACTED]  
to assure me during payment) [REDACTED] in  
workness as showing in his actions of [REDACTED] in person to speak FACE 2 FACE  
support the process. Injuries suffered are SEVERE &  
repetitive, Emotional & constant nightmares, mental corruption  
OF views from reality. Cruel unusual punishment inappropriate  
[REDACTED] From this action has  
left me damaged mental thinking and emotionally injured  
I'M [REDACTED] trouble separating real from Nightmares or DAY DREAMS

#### Claim II

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

Do to disabilities & lack of legal knowledge / counsel I would  
ask the courts please bring in an attorney / advocate to



better help me process the paper work in order to file my Tort claim because they cost \$ I don't want to waste the courts time nor my own in frivolous matters.

I don't have to let alone the \$ to file Tort or for legal fees, copies, counsel ect so I would like help getting this filed properly the first time. As of today's date Dep <sup>Fiedberger</sup> ~~Reidburger~~ still works the unit, has not been written up misconduct or held accountable. I feel Dep Sgt ~~Reidburger~~ <sup>Reidburger</sup> and his commander ~~ignored~~ <sup>ignored</sup> to me of both Tad Larson & Dep Sgt ~~Reidburger~~ by not handling matter pose a threat to safety & security of operations by leaving ~~Reidburger~~ on unit & not writing him up for misconduct.

### Claim III

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

I filed a grievance 5/31/22 Never went through chain of command never got response included in Tort.

I have a Kyle written to Sgt Reidburger included in Tort.

Filed Grievance 7/3/22 on ~~Reidburger~~ <sup>Sgt Securus</sup> Tad Larson, Sgt ~~Reidburger~~, Sgt ~~Reidburger~~ on Sgt Reidburger.

Filed Kyle 7/3/22 Sgt Peterson Filed Kyle 7/3/22 Tad Larson

Filed Kyle 7/3/22 M.H. other Grievances have as well other

paper work since been upheld, delayed, re-roated held or lost. But not responds to. appropriately - on going in side work.

(If you have additional claims, describe them on another piece of paper, using the same outline.)

#### IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

I have filed for administrative relief as to all claims in Section III and have concluded all administrative appeals available to me.

☒ Yes

☐ No

#### V. RELIEF

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

I would ask that the courts make MCT pay for all filing fees, copies, medical legal supplies, M4, doctor, and or prescriptions / debt due to processing or which occurred to this law suit. And or any counseling, and or other attorney fees, advocate fees, court fees etc. \$ DAMAGES \$ 50,000.00

I am asking Dep. Sgt. ~~Hebe~~ <sup>Hebe</sup> be demoted as well as Tad Larson Sgt. Reidburger and Dep. Sgt. ~~Hebe~~ all put in for resignation along with Dep. Sterling

Not only have most tried to stone will me but as well ~~Hebe~~ & used their positions to coverup actions which cause a threat to safety & security of institution & myself, but as well continue working Dep. ~~Hebe~~

my unit. This is unprofessional inappropriate & unconstitutional.

But each are not only guilty of conducting unprofessional behavior but break MCT Rule Regulations by not holding fellow employees accountable but are guilty of Aiding & Abetting working me the right to file criminal charges.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this ~~24th~~ day of ~~Aug~~ August, 2022

24<sup>th</sup>

(Signature of Plaintiff) & 910 #)